

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION**

SOCRATES SHAWN	§	
<i>Plaintiff,</i>	§	CIVIL ACTION NO.
v.	§	
	§	
CITY OF PROGRESO, TEXAS;	§	
CESAR SOLIS, in his individual and official	§	
Capacity; and ERNESTO LOZANO, in his	§	M – 22 – 116
Individual and official capacity	§	
<i>Defendants.</i>	§	

JOINT MOTION TO DISMISS

TO THE HONORABLE JUDGE OF SAID COURT:

PLAINTIFF **SOCRATES SHAWN** and DEFENDANTS **CITY OF PROGRESO, TEXAS, CESAR SOLIS** and **ERNESTO LOZANO** move this Court for an Order dismissing this case against Defendants, and in support thereof show:

Plaintiff **SOCRATES SHAWN** and Defendants **CITY OF PROGRESO, TEXAS, CESAR SOLIS** and **ERNESTO LOZANO**, by and through their attorneys of record, hereby inform the Court that the claims against Defendants have been compromised and settled and pray that all causes of action against Defendants be dismissed with prejudice as of the settlement.

WHEREFORE, PREMISES CONSIDERED, Plaintiff **SOCRATES SHAWN** and Defendants **CITY OF PROGRESO, TEXAS, CESAR SOLIS** and **ERNESTO**

LOZANO request that this Court enter an Order dismissing this suit with prejudice, with all Court costs to be borne by the party incurring same.

Signed on this 18th day of July, 2023.

Respectfully submitted,

/s/ Erin D. Thorn
Erin D. Thorn
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Attorney for Plaintiff

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**CITY OF PROGRESO, TEXAS,
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